

KEKER  
VAN NEST  
& PETERS

LATHAM & WATKINS LLP

MORRISON & FOERSTER

January 27, 2025

Hon. Sidney H. Stein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

cc: All Counsel of Record (via ECF)

**Re: *The New York Times Company v. Microsoft Corporation, et al.*, Case No. 1:23-cv-11195**

Dear Judge Stein:

On behalf of the OpenAI defendants,<sup>1</sup> we write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument on OpenAI's objection to Magistrate Judge Wang's December 2 orders. ECF 371–372.

Respectfully,

KEKER, VAN NEST &  
PETERS LLP\*

LATHAM & WATKINS  
LLP

MORRISON & FOERSTER  
LLP

/s/ Andrew F. Dawson  
Andrew F. Dawson

/s/ Elana Nightingale Dawson  
Elana Nightingale Dawson

/s/ Rose S. Lee  
Rose S. Lee

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\* All parties whose electronic signatures are included herein have consented to the filing of this document.

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<sup>1</sup> OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.